## IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

THOMAS LUCA JR., individually and on : CIVIL ACTION

behalf of all others similarly situated,

No.: 2:16-cv-00746 MRH

Plaintiff,

:

v.

WYNDHAM WORLDWIDE CORPORATION, WYNDHAM HOTEL GROUP, LLC, WYNDHAM HOTELS

AND RESORTS, LLC, and WYNDHAM HOTEL MANAGEMENT, INC.,

**Electronically Filed and Served** 

Defendants.

## MOTION FOR ADMISSION PRO HAC VICE OF ZACHARY A. AVALLONE

David A. Strassburger, Esquire, undersigned counsel for Defendants Wyndham Worldwide Corporation, Wyndham Hotel Group, LLC, Wyndham Hotels and Resorts, LLC and Wyndham Hotel Management, Inc., hereby moves that Zachary A. Avallone, Esquire be admitted to appear and practice in this Court in the above-captioned matter as counsel *pro hac vice* for Defendants Wyndham Worldwide Corporation, Wyndham Hotel Group, LLC, Wyndham Hotels and Resorts, LLC and Wyndham Hotel Management, Inc., pursuant to LCvR 83.2 and LCvR 83.3 and this Court's Standing Order Regarding *Pro Hac Vice* Admissions dated May 31, 2006 (Misc. No. 06-151).

In support of this Motion, undersigned counsel attaches the Affidavit for Admission *Pro Hac Vice* of Zachary A. Avallone filed herewith, which, it is averred, satisfies the requirements of the foregoing Local Rules and Standing Order.

## Respectfully submitted,

By: /s/David A. Strassburger

David A. Strassburger PA ID No. 76027

Four Gateway Center, Suite 2200 444 Liberty Avenue Pittsburgh, PA 15222 Telephone: (412) 281-5423 dstrassburger@smgglaw.com

Counsel for Defendants Wyndham Worldwide Corporation, Wyndham Hotel Group, LLC, Wyndham Hotels and Resorts, LLC and Wyndham Hotel Management, Inc.